

EXHIBIT B



**Service of Process
Transmittal**

02/10/2022

CT Log Number 541038020

TO: Chuck Morici
FORD MOTOR COMPANY
1 American Rd
Dearborn, MI 48126-2798

RE: Process Served in Michigan

FOR: Ford Motor Company (Domestic State: DE)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION:	Re: The Estate of Irene W. Shelby Representative) Robert N Shelby // To: Ford Motor Company
DOCUMENT(S) SERVED:	Summonses, Proof(s), Complaint
COURT/AGENCY:	52-3 District Court - Oakland County, MI Case # 22C00157GC
NATURE OF ACTION:	Employee Litigation - Claim regarding unlawful withdrawal funds from plaintiff's bank account
ON WHOM PROCESS WAS SERVED:	The Corporation Company, Plymouth, MI
DATE AND HOUR OF SERVICE:	By Process Server on 02/10/2022 at 15:54
JURISDICTION SERVED :	Michigan
APPEARANCE OR ANSWER DUE:	Within 21 days after receipt
ATTORNEY(S) / SENDER(S):	Robert N Shelby 525 Andover Ct. Rochester Hills, MI 48306 248-709-9145
ACTION ITEMS:	CT has retained the current log, Retain Date: 02/11/2022, Expected Purge Date: 02/16/2022 Image SOP
REGISTERED AGENT ADDRESS:	The Corporation Company 40600 Ann Arbor Road E Suite 201 Plymouth, MI 48170 877-564-7529 MajorAccountTeam2@wolterskluwer.com

The information contained in this Transmittal is provided by CT for quick reference only. It does not constitute a legal opinion, and should not otherwise be relied on, as to the nature of action, the amount of damages, the answer date, or any other information contained in the included documents. The recipient(s) of this form is responsible for reviewing and interpreting the included documents and taking appropriate action, including consulting with its legal and other advisors as necessary. CT disclaims all liability for the information contained in this form, including for any omissions or inaccuracies that may be contained therein.

Approved, SCAO

Original - Court
1st copy - Defendant2nd copy - Plaintiff
3rd copy - Return

STATE OF MICHIGAN
52-3 District Court JUDICIAL DISTRICT
700 Barkleys Circle JUDICIAL CIRCUIT
Rochester Hills, MI. COUNTY PROBATE

SUMMONS**CASE NO.**

22 - C00157 - GC

Court address

700 Barclay Circle, Rochester Hills, MI 48307

Court telephone no.

Plaintiff's name(s), address(es), and telephone no(s).
Irene W Shelby, Estate
Robert N Shelby
525 Andover Ct
Rochester Hills, MI. 48306

Plaintiff's attorney, bar no., address, and telephone no.
REPRESENTING OURSELF,
-- ROBERT SHELBY,

248 709 9145

Defendant's name(s), address(es), and telephone no(s).

FORD MOTOR COMPANY
FORD MOTOR COMPANY OF DELAWARE
THE CORPORATION COMPANY
40600 ANN ARBOR RD E
STE 201
PLYMOUTH, MICHIGAN, 48170
And

Ford Motor Defined Benefit Master Trust -
One American Drive
Room # 814
Dearborn Michigan 48126

Instructions: Check the items below that apply to you and provide any required information. Submit this form to the court clerk along with your complaint and, if necessary, a case inventory addendum (form MC 21). The summons section will be completed by the court clerk.

Domestic Relations Case

- ☐ There are no pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.
- ☐ There is one or more pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint. I have separately filed a completed confidential case inventory (form MC 21) listing those cases.
- ☐ It is unknown if there are pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.

Civil Case

- ☐ This is a business case in which all or part of the action includes a business or commercial dispute under MCL 600.8035.
- ☐ MDHHS and a contracted health plan may have a right to recover expenses in this case. I certify that notice and a copy of the complaint will be provided to MDHHS and (if applicable) the contracted health plan in accordance with MCL 400.106(4).
- ☒ There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.
- ☐ A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has

been previously filed in ☐ this court, ☐ _____ Court, where

it was given case number _____ and assigned to Judge _____.

The action ☐ remains ☐ is no longer pending.

Summons section completed by court clerk.

SUMMONS

CASE ASSIGNED TO (P37601)
JUDGE NANCY TOLWIN CARNIAK

NOTICE TO THE DEFENDANT: In the name of the people of the State of Michigan you are notified:

1. You are being sued.
2. **YOU HAVE 21 DAYS** after receiving this summons and a copy of the complaint to **file a written answer with the court** and serve a copy on the other party or **take other lawful action with the court** (28 days if you were served by mail or you were served outside this state).
3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.
4. If you require special accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

Issue date 1 - 21 - 22	Expiration date* 4 - 22 - 22	Court clerk AMY L. LUCE TO
---------------------------	---------------------------------	--------------------------------------

*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

SUMMONS

Case No. _____

PROOF OF SERVICE

TO PROCESS SERVER: You are to serve the summons and complaint not later than 91 days from the date of filing or the date of expiration on the order for second summons. You must make and file your return with the court clerk. If you are unable to complete service you must return this original and all copies to the court clerk.

CERTIFICATE / AFFIDAVIT OF SERVICE / NONSERVICE☐ **OFFICER CERTIFICATE**

OR

☐ **AFFIDAVIT OF PROCESS SERVER**

I certify that I am a sheriff, deputy sheriff, bailiff, appointed court officer, or attorney for a party (MCR 2.104[A][2]), and that: (notarization not required)

Being first duly sworn, I state that I am a legally competent adult, and I am not a party or an officer of a corporate party (MCR 2.103[A]), and that: (notarization required)

- ☐ I served personally a copy of the summons and complaint,
☐ I served by registered or certified mail (copy of return receipt attached) a copy of the summons and complaint,

together with _____

List all documents served with the summons and complaint

_____ on the defendant(s):

Defendant's name	Complete address(es) of service	Day, date, time

- ☐ I have personally attempted to serve the summons and complaint, together with any attachments, on the following defendant(s) and have been unable to complete service.

Defendant's name	Complete address(es) of service	Day, date, time

I declare under the penalties of perjury that this proof of service has been examined by me and that its contents are true to the best of my information, knowledge, and belief.

Service fee	Miles traveled	Fee	
\$		\$	
Incorrect address fee	Miles traveled	Fee	TOTAL FEE
\$		\$	\$

Signature _____

Name (type or print) _____

Title _____

Subscribed and sworn to before me on _____, _____ County, Michigan.

Date

My commission expires: _____

Date

Signature: _____

Deputy court clerk/Notary public

Notary public, State of Michigan, County of _____

ACKNOWLEDGMENT OF SERVICE

I acknowledge that I have received service of the summons and complaint, together with _____ Attachments

_____ on

Day, date, time

_____ on behalf of _____

Signature

Approved, SCAO

Original - Court
1st copy - Defendant2nd copy - Plaintiff
3rd copy - Return52-3
**STATE OF MICHIGAN
JUDICIAL DISTRICT
JUDICIAL CIRCUIT
COUNTY PROBATE****COMPLAINT**
Page of pages**CASE NO.****Court address**

700 Barclay Cir. Rochester Hills, MI. 48307

Court telephone no.

Plaintiff's name(s), address(es), and telephone no(s).

Irene W Shelby Estate
Robert Shelby, repersenting the Estate
525 Andover CT
Rochester Hills, MI. 48306

Plaintiff's attorney, bar no., address, and telephone no.

Robert Shelby, repersenting the Estate 248 709 9145.

v

Defendant's name(s), address(es), and telephone no(s).

Ford Motor Company
40600 Ann Arbor Road E.
STE. 201
Plymouth Michigan, 48170
AND
Ford Motor Defined Benifit Master Trust
One American Road
Room #814
Dearborn Michigan, 48126

Date

1/21/2022

Signature

R. Shelby

2022 JAN 21 P 1:06

IN THE DISTRICT COURT OF MICHIGAN, 52-3 District Court, OAKLAND COUNTY

The Estate of Irene W. Shelby,
Dob, 08/17/23
Date of death, 01-24/2016
Soc. Sec. #xxx-xx-7282
(Representative), Robert N Shelby, 248-709-9145
525 Andover Ct
Rochester Hills, Michigan
48306

V.

FORD MOTOR COMPANY
FORD MOTOR COMPANY OF DELAWARE
THE CORPORATION COMPANY
40600 ANN ARBOR RD E
STE 201
PLYMOUTH, MICHIGAN, 48170

NO. _____

And

Ford Motor Defined Benefit Master Trust
One American Drive
Room # 814
Dearborn Michigan 48126

COMPLAINT

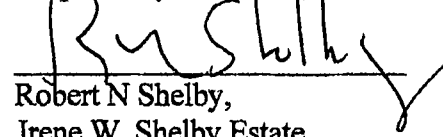
Comes now, The estate of Irene W. Shelby, deceased January 24, 2016, Plaintiff. Represented by Robert N. Shelby (Son), and files this complaint against FORD MOTOR COMPANY and Ford Motor Defined Benefit Master Trust and for cause would show as follows:

1. Plaintiff is an adult resident of Rochester Hills; Michigan Plaintiff represents the estate of Irene W Shelby and is the Executive of the Last Will and Testament and the Substitute Trustee of the Irene W Shelby Living Trust.
2. In addition, Plaintiff is the recipient of a pension plan benefit from Ford Motor Company and has been receiving said benefit for approximately forty years.

2. Defendant, FORD MOTOR COMPANY Is the former employer of Plaintiff and care holder of pension fund, Ford Motor Defined Benefit Master Trust is believed to be the benefit manager.
3. On or about the February 15 2016, Defendant made a with draw from the Plaintiff checking account held at Comerica Bank Rochester Hills Michigan. In the amount of \$7,392.19
4. The Defendant had no authority to withdraw any funds from the Plaintiff's bank account. The defendant has verbally acknowledged that they did make this withdraw in error as the date of death was incorrectly entered into their data system.
5. Plaintiff has requested both in writing and phone conversations to the Ford Motor Pension Department a full refund of the \$7392.19. The requests have not been addresses and the Defendants are is in possession of the funds.

WHEREFORE, Plaintiff brings this action against FORD MOTOR COMPANY and Ford Motor Defined Benefit Master Trust demands judgment in the sum of \$7392.19 with interest, compensatory damages and court fees and all costs of these proceedings.

Respectfully submitted,


Robert N Shelby,
Irene W. Shelby Estate
525 Andover Ct.
Rochester Hills, Michigan, 48306
248 709 9145

Approved, SCAO

Original - Court
1st copy - Defendant2nd copy - Plaintiff
3rd copy - Return

STATE OF MICHIGAN
52-3 District Court JUDICIAL DISTRICT
700 Barkleys Circle JUDICIAL CIRCUIT
Rochester Hills, MI. COUNTY PROBATE

SUMMONS**CASE NO.**

22-C00157-GC

Court address

700 Barclay Circle, Rochester Hills, MI 48307

Court telephone no.

Plaintiff's name(s), address(es), and telephone no(s).

Irene W Shelby, Estate
Robert N Shelby
525 Andover Ct
Rochester Hills, MI. 48306

Plaintiff's attorney, bar no., address, and telephone no.

REPRESENTING OURSELF,
-- ROBERT SHELBY,

248 709 9145

Defendant's name(s), address(es), and telephone no(s).

FORD MOTOR COMPANY
FORD MOTOR COMPANY OF DELAWARE
THE CORPORATION COMPANY
40600 ANN ARBOR RD E
STE 201
PLYMOUTH, MICHIGAN, 48170
And

Ford Motor Defined Benefit Master Trust
One American Drive
Room # 814
Dearborn Michigan 48126

Instructions: Check the items below that apply to you and provide any required information. Submit this form to the court clerk along with your complaint and, if necessary, a case inventory addendum (form MC 21). The summons section will be completed by the court clerk.

Domestic Relations Case

- ☐ There are no pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.
- ☐ There is one or more pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint. I have separately filed a completed confidential case inventory (form MC 21) listing those cases.
- ☐ It is unknown if there are pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.

Civil Case

- ☐ This is a business case in which all or part of the action includes a business or commercial dispute under MCL 600.8035.
- ☐ MDHHS and a contracted health plan may have a right to recover expenses in this case. I certify that notice and a copy of the complaint will be provided to MDHHS and (if applicable) the contracted health plan in accordance with MCL 400.106(4).
- ☒ There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.
- ☐ A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has

been previously filed in ☐ this court, ☐ _____ Court, where

it was given case number _____ and assigned to Judge _____.

The action ☐ remains ☐ is no longer pending.

CASE ASSIGNED TO (P37601)**SUMMONS JUDGE NANCY TOLWIN CARNIAK**

Summons section completed by court clerk.

NOTICE TO THE DEFENDANT: In the name of the people of the State of Michigan you are notified:

1. You are being sued.
2. **YOU HAVE 21 DAYS** after receiving this summons and a copy of the complaint to **file a written answer with the court** and serve a copy on the other party **or take other lawful action with the court** (28 days if you were served by mail or you were served outside this state).
3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.
4. If you require special accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

Issue date 1-21-22	Expiration date* 4-22-22	Court Clerk AMY L. LUCE TO
-----------------------	-----------------------------	-------------------------------

*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

Approved, SCAO

Original - Court
1st copy - Defendant2nd copy - Plaintiff
3rd copy - Return

52-3 STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT COUNTY PROBATE	COMPLAINT Page of pages	CASE NO.
--	---	-----------------

Court address

Court telephone no.

700 Barclay Cir. Rochester Hills, MI. 48307

Plaintiff's name(s), address(es), and telephone no(s).

Irene W Shelby Estate
 Robert Shelby, repersenting the Estate
 525 Andover CT
 Rochester Hills, MI. 48306

Plaintiff's attorney, bar no., address, and telephone no.

Robert Shelby, repersenting the Estate 248 709 9145.

v

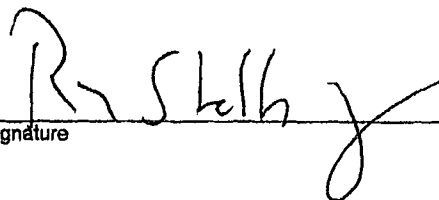
Defendant's name(s), address(es), and telephone no(s).

Ford Motor Company
 40600 Ann Arbor Road E.
 STE. 201
 Plymouth Michigan, 48170
 AND
 Ford Motor Defined Benifit Master Trust
 One American Road
 Room #814
 Dearborn Michigan, 48126

Date

1/21/2022

Signature



IN THE DISTRICT COURT OF MICHIGAN, 52-3 District Court, OAKLAND COUNTY

The Estate of Irene W. Shelby,
Dob, 08/17/23
Date of death, 01-24/2016
Soc. Sec. #xxx-xx-7282
(Representative), Robert N Shelby, 248-709-9145
525 Andover Ct
Rochester Hills, Michigan
48306

_____)
)
V.)
FORD MOTOR COMPANY)
FORD MOTOR COMPANY OF DELAWARE)
THE CORPORATION COMPANY
40600 ANN ARBOR RD E
STE 201
PLYMOUTH, MICHIGAN, 48170

NO. _____

And

Ford Motor Defined Benefit Master Trust
One American Drive
Room # 814
Dearborn Michigan 48126

COMPLAINT

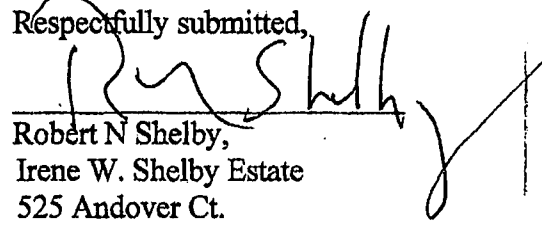
Comes now, The estate of Irene W. Shelby, deceased January 24, 2016, Plaintiff. Represented by Robert N. Shelby (Son), and files this complaint against FORD MOTOR COMPANY and Ford Motor Defined Benefit Master Trust and for cause would show as follows:

1. Plaintiff is an adult resident of Rochester Hills; Michigan Plaintiff represents the estate of Irene W Shelby and is the Executive of the Last Will and Testament and the Substitute Trustee of the Irene W Shelby Living Trust.
2. In addition, Plaintiff is the recipient of a pension plan benefit from Ford Motor Company and has been receiving said benefit for approximately forty years.

2. Defendant, FORD MOTOR COMPANY Is the former employer of Plaintiff and care holder of pension fund, Ford Motor Defined Benefit Master Trust is believed to be the benefit manager.
3. On or about the February 15 2016, Defendant made a with draw from the Plaintiff checking account held at Comerica Bank Rochester Hills Michigan. In the amount of \$7,392.19
4. The Defendant had no authority to withdraw any funds from the Plaintiff's bank account. The defendant has verbally acknowledged that they did make this withdraw in error as the date of death was incorrectly entered into their data system.
5. Plaintiff has requested both in writing and phone conversations to the Ford Motor Pension Department a full refund of the \$7392.19. The requests have not been addresses and the Defendants are is in possession of the funds.

WHEREFORE, Plaintiff brings this action against FORD MOTOR COMPANY and Ford Motor Defined Benefit Master Trust demands judgment in the sum of \$7392.19 with interest, compensatory damages and court fees and all costs of these proceedings.

Respectfully submitted,


Robert N Shelby,
Irene W. Shelby Estate
525 Andover Ct.
Rochester Hills, Michigan, 48306
248 709 9145